

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a)
Working Case for the Development of)
Best Practices for Wildfire Mitigation)
In Missouri)

Case No. OW-2025-0314

**GRAIN BELT EXPRESS LLC’S RESPONSE TO COMMISSION ORDER OPENING A
WORKING CASE FOR DEVELOPMENT OF BEST PRACTICES FOR UTILITY
WILDFIRE MITIGATION IN MISSOURI**

Pursuant to the May 14, 2025 *Order Opening a Working Case to Assist in the Development of Best Practices for Utility Wildfire Mitigation in Missouri and Assessment of Risk*, Grain Belt Express LLC hereby submits its responses to the questions posed by the Commission in **Attachment A** to the May 14, 2025 Order.

WHEREFORE, Grain Belt respectfully requests that the Commission accept the attached responses.

Respectfully submitted,

POLSINELLI PC

/s/ Anne E. Callenbach

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ATTORNEYS FOR RESPONDENT

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all parties of record by email or U.S. mail, postage prepaid, this 30th day of June, 2025.

/s/ Anne E. Callenbach

Attorney for Respondents

QUESTIONS FOR ELECTRICAL CORPORATIONS**A. Foundational Questions**

1. Describe and document how current policies, procedures, and plans consider the risks of wildfires. In your response, specifically consider the current vegetation management plan, policies and procedures regarding infrastructure inspection standards, and other emergency or restoration plans.

Grain Belt Express (GBX) does not have existing operating policies, procedures, and plans as it is still in the engineering design phase with construction expected to start sometime in 2026. As GBX develops these plans, it will take into account wildfire risks associated with the State of Missouri, including the best practices that will result from this effort.

When developing its operating policies/plans, GBX will start with certain existing Invenergy policies and adjust for GBX specific items. One example is the use of Invenergy's Transmission Vegetation Management plan, where Invenergy's strategy is to manage vegetation located on transmission rights of way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, which reduces the risk of vegetation-related outages, thereby mitigating wildfire risk.

GBX will also integrate fast acting protection systems on both its high voltage DC and AC systems to de-energize its facilities quickly in the instance where energized components come in contact with its surroundings. GBX will also use regularly scheduled inspections evaluating the condition of its facilities (avoiding uncontrolled failures) and proximity of vegetation to its facilities.

2. Describe your experience communicating with state and local governments regarding wildfires and/or wildfire risk in your service territory.

GBX has communicated extensively with state agencies and local governments during the development stage of the Project and will coordinate its emergency operating plans with state and local governments prior to energizing any of its facilities for operation.

3. Do you have insurance coverage for wildfire damage? If yes, does your insurance coverage require you to have a wildfire mitigation plan (WMP) or make any special preparations regarding wildfires? Please explain.

Yes, GBX has wildfire liability coverage. Wildfire liability insurance coverage availability is not tied to WMP or any special preparations regarding wildfires.

4. Have you developed a Public Safety Power Shutoff (PSPS) policy with respect to wildfires? If a PSPS policy exists, please describe:

- a.) How customers are notified.
- b.) Whether medically vulnerable or critical infrastructure customers are prioritized for communication or assistance.
- c.) How commercial and industrial or other customer types are notified.

GBX has not developed a PSPS, but we recognize that this is a requirement or a tool utilized by load-serving entities in many western states.

5. If you do not currently have a wildfire-specific policy or WMP, do you plan to develop one? What is the anticipated timeline?

GBX does not have existing operating policies, procedures, and plans as it is still in the engineering design phase with construction expected to start sometime in 2026. When GBX develops these plans, it will take into account wildfire risks associated with the State of Missouri, including the best practices that will result from this effort. Consistent with condition IV “Emergency Restoration Plans” to GBX’s Certificate of Convenience and Necessity, GBX will have these plans in place and will coordinate with the proper parties prior to energizing its facilities for operation.

B. Risk Assessment & Mapping

1. Please explain, for planning purposes, your ability to reliably model various climate and weather scenarios. Specifically, discuss your ability to understand how changing weather patterns impact wildfire risk across your grid.

As engineering and development progress, we will evaluate modeling various climate and weather scenarios and risk assessment. We anticipate evaluating the information gathered in this proceeding to inform future decisions in this area.

2. If you have implemented a WMP, what types of climate and weather scenarios have been modeled? **See Response to B.1.**
3. Have you included sources of ignition from external causes when developing the

WMP? **See Response to B.1.**

4. Are there any utility-owned models or partnerships (e.g., with universities or NOAA) for fire spread or risk prediction? **See Response to B.1.**

C. Situational Awareness & Forecasting

1. Describe the types of weather variables collected for your situational awareness during weather or other unforeseen events, including wildfires.

As noted above, when a WMP is developed we will be in a better position to respond.

2. Describe the types of weather variables collected for forecasting purposes. **See Response to C.1.**
3. Do you use third-party weather services or modeling software (e.g., IBM's Weather Company, NCAR tools) for predictive analytics related to wildfire conditions? **See Response to C.1.**
4. How is situational data integrated into operational systems (e.g., SCADA, ADMS)? **See Response to C.1.**

D. Grid Design & System Hardening

1. Please describe how you prioritize WMP initiatives across your service territory.

When GBX develops operating policies, procedures, and plans it will take into account wildfire risks associated with the State of Missouri, including the best practices that will result from this proceeding.

2. Have any overlap with components of your vegetation management or major asset maintenance plans been identified? If so, please explain.

Yes. Invenenergy's strategy is to manage vegetation located on transmission rights of way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, which reduces the risk of vegetation-related outages, thereby mitigating wildfire risk.

3. Please describe if you have deployed or plan to deploy:

a.) Covered conductors - **No**

b.) Fire-resistant poles or hardware – **All of GBX's structures will be designed to be durable in a fire by utilizing materials that can**

withstand high temperatures, offsetting the immediate effects of a fire.

c.) Remote fault indicators – **Yes**

d.) Undergrounding of lines in high-risk areas - **No**

E. Asset Management & Inspections

1. Has an inventory of assets and a condition rating of those assets been conducted? **Not at this time.**
2. Describe how your inspection practices, including, but not limited to, inspections conducted pursuant to 20 CSR 4240-23.020, may be leveraged for development of a WMP. **We will evaluate inspection practices at the appropriate time.**

F. Vegetation Management & Inspections

1. What level of vegetation inventory and condition assessments have been made within your service area? **These assessments have not been done at this time.**
2. Do you use remote sensing (LiDAR, satellite, or drone imagery) to support vegetation assessments? **When GBX develops operating policies, procedures, and plans it will take into account technology that can be utilized to support its Transmission Vegetation Management Plan, WMP, and other operating plans. GBX will also evaluate best practices resulting from this proceeding to inform our decisions.**

G. Grid Operations & Protocols

1. Has an analysis been made of the various protective equipment and device settings that would be needed or used to implement a WMP? **As discussed above, GBX is designing fast reacting protection systems on both its AC and DC systems that will be able to clear faults in cycles (milliseconds). These fast-acting protection systems will limit the amount of energy expelled during fault conditions where vegetation could be present (e.g., conductor fails and drops to the ground), mitigating wildfire risk.**

H. Data Governance

1. Have you considered what types of data it would be necessary to utilize for the implementation of a WMP, and how and where that data would be stored? If so, please explain. **Not at this time.**

2. Have you analyzed existing data, or collected new data to be used in developing and implementing a WMP? **See Response to H.1.**
3. Have you evaluated data aggregation and identified any sources of data that are siloed which need to be incorporated? **See Response to H.1.**

I. Resource Allocation Methodology

1. Has an analysis been conducted that would designate how existing resources could be utilized in the implementation of a WMP? **When GBX develops operating policies, procedures, and plans it will take into account existing resources that can be utilized. GBX will also evaluate best practices resulting from this proceeding to inform our decisions.**
2. Has any analysis been done of utilization of the existing resource allotment based on varying risk scenarios? **See response to I.1.**
3. Have any additional needed resources required to implement a WMP been identified? **See response to I.1.**
4. Are there internal or external constraints limiting the ability to fully implement a WMP? **See response to I.1.**

J. Emergency Planning & Preparedness

1. If a WMP has been created, please describe if or how it has been integrated with any other overall disaster or emergency plans (prepared by any State or local entity). **Once a WMP is created, we will evaluate how to integrate with any applicable state or local disaster or emergency plans or preparedness actions.**
2. Do you participate in annual tabletop or full-scale wildfire response exercises with state or local agencies? **Not at this time.**
3. Have you collaborated with investor owned utilities, rural electric cooperatives and/or municipally owned electrical suppliers for communication and integrating emergency plans? **No, not at this time.**

K. Stakeholder Cooperation & Community Engagement

1. Has a procedure been developed to share information and support other utilities your utility coordinates with, including rural electric cooperatives and/or municipally owned electrical suppliers? **A procedure has not been developed at this time, but we anticipate coordinating with relevant local entities at the**

appropriate time.

2. Please describe if there has there been any education or involvement of the public about the various components of an existing (or proposed) WMP. **Not at this time.**
3. Are you willing to share your GIS system maps with the Missouri Public Service Commission and/or State Emergency Management Agency during emergencies? If no, please explain why. If you would be willing but there are constraints, please specifically explain them with citations if necessary. **Yes, subject to restrictions on confidentiality pertaining to CEI or other exemptions prohibiting or restricting release of confidential data.**